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February 25, 1999

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

Re: CC Docket No. 96-128, In the Matter of Implementation of Pay Telephone
Reclassification and Compensation Provisions of the Telecommunications Act of
1996

Dear Ms. Roman Salas:

Pursuant to Section 1.206(b)(1) of the Rules of the Federal Communications Commission, 47C.F.R. Section 1.1206(b)(1), enclosed for filing are two copies of an Ex Parte letter that is being transmitted to Ms. Anna M. Gomez, Chief of the Network Services Division, Common Carrier Bureau.

Please see that these materials are associated with CC Docket No. 96-128 and become part of the record for this proceeding. Thank you in advance for your assistance with this matter.

Finally, please note that a third copy of this letter has been included so it can be stamped as received and returned in the stamped self addressed envelope that is included.

Very truly yours,


Gregory A. Ludvigsen

Attachment

cc: Anna M. Gomez

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February 25, 1999

Richard Rubin, Esq.
AT&T Corp.
Room 3252 I 3
295 North Maple Ave.
Basking Ridge, NJ 07920

Re: Order Status for FLEX ANI 70 and 29 in The 14 States Served By US WEST

Dear Mr. Rubin:

We are writing on behalf of the Northwest Payphone Association, Arizona Payphone Association, Colorado Payphone Association and the Minnesota Independent Payphone Association. We are requesting the status of AT&T's request for FLEX ANI 70 and 29 service in each of the end offices, of all of the local exchange companies, in the 14 states served by US WEST. If AT&T has not ordered Flex ANI from the local exchange companies in this 14 state area, then we request that it immediately do so, unless AT&T can confirm it has been able to implement per call compensation without FLEX ANI.

As you know in FCC Docket No. CC 96-128, DA 98-481, Memorandum Opinion and Order, Released March 9, 1998 the FCC ordered the local exchange carriers to establish and install a unique identification code to identify pay telephone lines to interexchange carriers. The FCC designated FLEX ANI code 70 for pay telephones connected to Basic PAL lines and FLEX ANI code 29 for pay telephones in inmate locations. Pay telephones connected to smart PAL lines (aka coinlines) would still transmit ANI code 27.

The unique FLEX ANI Codes 70 and 29 were established in large part at the request of IXC's, such as AT&T. These IXC's stated that their accounting systems would not be able to pay per call dial around to pay station providers (PSP) without a unique identification code. US WEST finished most of the installation of FLEX ANI codes 70 and 29 in 90% of its end offices by June 30, 1998. The installation was completed in all but a few of the US WEST end offices by December 31, 1998. We believe that it has also been completed in almost all other local exchange company end offices.

Our members have been testing their payphone lines in many end offices and in many states to see if FLEX ANI code 70 and 29 have been installed. At this time they have not found

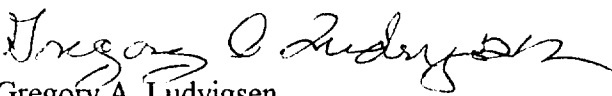
any locations served by U S West or GTE where these codes are being transmitted to AT&T. This is giving our clients a great deal of concern about AT&T's ability and intention to accurately track and pay per call dial around compensation.

In discussions with US WEST, it has confirmed that the installation of FLEX ANI codes 70 and 29 have been completed in all but a couple of their end offices. US WEST has stated that it will not transmit FLEX ANI codes 70 and 29 to an IXC until it orders Flex ANI service. US WEST states that it is concerned that if the carrier is not ready to receive the codes that the call could be dropped. US WEST has taken the position that it is the obligation of the IXCs to order FLEX ANI codes 70 and 29 by end office and by Carrier Identification Code (CIC). US WEST has also stated that it has informed the carriers, including AT&T, of these requirements. The carriers have also been advised that the codes will be installed at no charge to them, since the PSPs will be paying for the installation of the codes. (FCC Order, DA 98-481, Memorandum Opinion and Order, Released March 9, 1998, paragraphs 35 and 37). In an ex parte filing to the FCC, dated January 8, 1999, CC Docket No. 96-128, US WEST reported on the status of its installation of FLEX ANI codes 70 and 29. In that same filing it listed a number of carriers that had ordered these codes, AT&T's name was not mentioned as having ordered FLEX ANI codes 70 or 29.

Pursuant FCC Order, DA 98-481, paragraph 37 AT&T "must" order FLEX ANI 70 and 29. Please advise us of the status of AT&T's ordering and installation of FLEX ANI service in US WEST territory, GTE and all of the other local exchange carriers in the 14 state region served by US WEST. We would like to know when these codes were ordered by AT&T by end office and CIC, and what is the current expected installation date. If it has not ordered these codes, when will the orders be placed, and how can you assure our clients they will be accurately paid per call dial around compensation prior to installation of these codes?

We look forward to your reply. Obviously, accurate and timely payment of per call dial around compensation is very important to our clients. We are concerned that AT&T, in particular, represented to the FCC that ANI ii was necessary for per call compensation, yet seven months after the service has been widely available it has not been implemented on AT&T's network. We hope you can address our concerns and promptly take any corrective or remedial action that may be necessary.

Very truly yours,


Gregory A. Ludvigsen

cc: Anna Gomez, FCC
Kurt Schroeder, FCC
Raymond Heyman
Brooks Harlow
Craig Joyce
Robert Aldrich